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*Conf is adjourned and time is
extended to March 1, 2022 @ 10:30 am;
in the interest of justice.*
December 27, 2021

VIA ECF

Hon. Alvin K. Hellerstein
United States District Judge
500 Pearl Street
New York, NY 10007

Re: United States v. Jose Medina, et
21 Cr. 377 (AKH)

Dear Judge Hellerstein:

I, along with Lauren Di Chiara, am the attorney for Nelson Rodriguez, a defendant in the above-referenced matter. This case is scheduled for a status conference for January 4, 2022 at 12 PM. I have spoken with all the parties with the exception of Mr. Bell, counsel for Angel Benitez, who has not yet responded to my calls and emails. There have been problems accessing significant portions of the voluminous discovery and the Government and the defendants have made a number of efforts to resolve the issues. However, all counsel I have spoken to agree that more time is necessary to complete the discovery process.

Accordingly, counsel respectfully request that this matter be adjourned for approximately 60 days in order to complete the discovery process. The Government informs me that it consents to this application.

Respectfully submitted,

/s/

Harvey Fishbein

cc: All counsel (via ECF)